

IAN BARNHART,)
individually and on behalf of all others)
similarly situated,)
)
Plaintiff,)
)
v.) CASE NO. 1:17-cv-00124-TLS-SLC
)
DAVID GLADIEUX,)
in his official capacity,)
)
Defendant.)

Plaintiff, Ian Barnhart, individually and on behalf of all others similarly situated, respectfully requests the Court certify the class as defined in this action alleging Defendant unconstitutionally denied more than 300 active registered voters held in the Allen County Jail their fundamental right to vote in 2016 general election.

Wherefore, Plaintiff respectfully requests the Court certify the class as defined, and for all other just and property relief.

Respectfully,

CHRISTOPHER C. MYERS & ASSOCIATES

/s/ David W. Frank

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that on March 7, 2018, a true and correct copy of the foregoing document was served electronically via CM/ECF to Defendant's counsel of record.

/s/ David W. Frank

David W. Frank

DF/